

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSISSIPPI

D'ANGELO TOWNSEL

PLAINTIFF

VERSUS

CAUSE NO. 22-34

RAMON A. WILLIAMS;
WILMER TRUCKING COMPANY
JOHN DOE, 1-5 & JOHN DOE
COMPANY 1-5

DEFENDANT

I, RANDY CARNEY, Clerk of the Circuit Court, in and for said County and State the same being a Court of Record, having a seal, do hereby officially certify that I am the proper custodian of all the books, papers, records, files and documents of said Court and of the Seal thereof, and that the foregoing is a full, true and complete copy of documents listed for the above styled case:

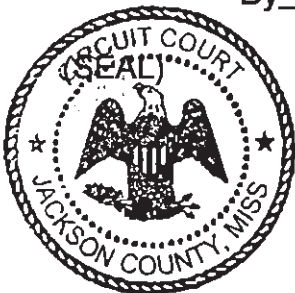
ENTIRE FILE

recorded, as full, true and complete as the same now appears of record in the records of JACKSON COUNTY CIRCUIT COURT, PASCAGOULA, MISSISSIPPI in my office.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the seal of said Court at my office in Pascagoula in said County and State on this the 17th day of March, 2022.

RANDY CARNEY, Clerk
Circuit Court
Jackson County, Mississippi

By BQ McCleary D.C.



COVER SHEET Civil Case Filing Form <i>(To be completed by Attorney/Party Prior to Filing of Pleading)</i>		Court Identification Docket Number <div style="border: 1px solid black; padding: 2px; display: inline-block;">3019C#</div> <small>County # Judicial Court ID District (CH, CI, CO)</small>	Case Year <div style="border: 1px solid black; padding: 2px; display: inline-block;">2022</div>	Docket Number <div style="border: 1px solid black; padding: 2px; display: inline-block;">00034</div> <small>Local Docket ID</small>						
<small>Mississippi Supreme Court Administrative Office of Courts</small>		<small>Form AOC/01 (Revised 1/1/2001)</small>		<div style="border: 1px solid black; padding: 2px; display: inline-block;">021722</div> <small>Month Date Year</small>						
This area to be completed by clerk										
IN THE <u>CIRCUIT</u> COURT OF <u>JACKSON</u> COUNTY Short Style of Case: <u>Dangelo Townsel v. Ramon A Williams and Wilmar Trucking Company and John Doe 1-5 and John Doe Company 1-5</u> Party Filing Initial Pleading: Type/Print Name <u>Jay Foster Attorney</u> MS Bar No. <u>9830</u> Check (✓) if Not an Attorney Check (✓) if Pro Hac Vice Signature <u>[Signature]</u> Compensatory Damages Sought: \$ <u> </u> Punitive Damages Sought: \$ <u> </u> Is Child Support contemplated as an issue in this suit? <u>Yes</u> <input checked="" type="checkbox"/> <u>No</u> If "yes" is checked, please submit a completed Child Support Information Sheet with Final Decree/Judgment PLAINTIFF - PARTY(IES) INITIALLY BRINGING SUIT SHOULD BE ENTERED FIRST (FIRST NAME IN SHORT STYLE) - ENTER ADDITIONAL PLAINTIFFS ON SEPARATE FORM										
Individual <u>Townsel</u> Last Name <u>Dangelo</u> First Name <u> </u> Maiden Name, if Applicable <u> </u> Middle Init <u> </u> Jr/Sr/III/IV <u> </u> Address of Plaintiff <u>105-B Williams Estate Rd, Lucedale, MS 39452</u> Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: <u> </u> Estate of <u> </u> Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: <u> </u> D/B/A / Agency <u> </u> Business <u> </u> <small>Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated</small> Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the above, and enter below: <u> </u> D/B/A: <u> </u>										
DEFENDANT - NAME OF DEFENDANT (FIRST NAME IN SHORT STYLE) - ENTER ADDITIONAL DEFENDANTS ON SEPARATE FORM <u>499 Robinson Circle</u> Individual <u>Williams</u> Last Name <u>Ramon</u> First Name <u> </u> Maiden Name, if Applicable <u> </u> Middle Init <u> </u> Jr/Sr/III/IV <u> </u> Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: <u> </u> Estate of <u> </u> Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: <u> </u> D/B/A / Agency <u> </u> Business <u> </u> <small>Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated</small> Check (✓) if Business Defendant is being sued in the name of an entity other than the above, and enter below: <u> </u> D/B/A: <u> </u>										
ATTORNEY FOR THIS DEFENDANT: <u> </u> Bar No. <u> </u> or Name: <u> </u> Pro Hac Vice (✓) <u> </u> <small>(if known)</small>										
In left hand column, check one (1) box that best describes the nature of this suit. In right hand column check all boxes which indicate secondary claims.										
Business/Commercial <input type="checkbox"/> Accounting (Business) <input type="checkbox"/> Bankruptcy <input type="checkbox"/> Business Dissolution - Corporation <input type="checkbox"/> Business Dissolution - Partnership <input type="checkbox"/> Debt Collection <input type="checkbox"/> Employment <input type="checkbox"/> Examination of Debtor <input type="checkbox"/> Execution <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Pension <input type="checkbox"/> Receivership <input type="checkbox"/> Replevin <input type="checkbox"/> Stockholder Suit <input type="checkbox"/> Other <u> </u>	Domestic Relations <input type="checkbox"/> Child Custody/Visitation <input type="checkbox"/> Child Support <input type="checkbox"/> Contempt <input type="checkbox"/> Divorce: Fault <input type="checkbox"/> Divorce: Irreconcilable Differences <input type="checkbox"/> Domestic Abuse <input type="checkbox"/> Emancipation <input type="checkbox"/> Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Property Division <input type="checkbox"/> Separate Maintenance <input type="checkbox"/> Termination of Parental Rights <input type="checkbox"/> UIFSA (formerly URESA) <input type="checkbox"/> Other <u> </u>	Contract <input type="checkbox"/> Breach of Contract <input type="checkbox"/> Installment Contract <input type="checkbox"/> Insurance <input type="checkbox"/> Product Liability under Contract <input type="checkbox"/> Specific Performance <input type="checkbox"/> Other <u> </u>	Probate <input type="checkbox"/> Accounting (Probate) <input type="checkbox"/> Birth Certificate Correction <input type="checkbox"/> Commitment <input type="checkbox"/> Conservatorship <input type="checkbox"/> Guardianship <input type="checkbox"/> Heirship <input type="checkbox"/> Intestate Estate <input type="checkbox"/> Minor's Settlement <input type="checkbox"/> Muniment of Title <input type="checkbox"/> Name Change <input type="checkbox"/> Power of Attorney <input type="checkbox"/> Testate Estate <input type="checkbox"/> Will Contest <input type="checkbox"/> Other <u> </u>	Statutes/Rules <input type="checkbox"/> Bond Validation <input type="checkbox"/> Civil Forfeiture <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> ERISA <input type="checkbox"/> Eminent Domain <input type="checkbox"/> Extraordinary Writ <input type="checkbox"/> Federal Statutes <input type="checkbox"/> Injunction or Restraining Order <input type="checkbox"/> Municipal Annexation <input type="checkbox"/> Racketeering (RICO) <input type="checkbox"/> Railroad <input type="checkbox"/> Seaman <input type="checkbox"/> Other <u> </u>	Appeals <input type="checkbox"/> Administrative Agency <input type="checkbox"/> County Court <input type="checkbox"/> Hardship Petition (Driver License) <input type="checkbox"/> Justice Court <input type="checkbox"/> MS Employment Security Comm'n <input type="checkbox"/> Municipal Court <input type="checkbox"/> Oil & Gas Board <input type="checkbox"/> Workers' Compensation <input type="checkbox"/> Other <u> </u>	Children and Minors - Non-Domestic <input type="checkbox"/> Adoption - Noncontested <input type="checkbox"/> Consent to Abortion for Minor <input type="checkbox"/> Removal of Minority <input type="checkbox"/> Other <u> </u>	Torts - Personal Injury <input type="checkbox"/> Bad Faith <input type="checkbox"/> Fraud <input type="checkbox"/> Loss of Consortium <input type="checkbox"/> Malpractice - Legal <input type="checkbox"/> Malpractice - Medical <input checked="" type="checkbox"/> Negligence - General <input type="checkbox"/> Negligence - Motor Vehicle <input type="checkbox"/> Products Liability <input type="checkbox"/> Wrongful Death <input type="checkbox"/> Other <u> </u>	Mass Tort <input type="checkbox"/> Asbestos <input type="checkbox"/> Chemical Spill <input type="checkbox"/> Dioxin <input type="checkbox"/> Hand/Arm Vibration <input type="checkbox"/> Hearing Loss <input type="checkbox"/> Radioactive Materials <input type="checkbox"/> Other <u> </u>	Real Property <input type="checkbox"/> Adverse Possession <input type="checkbox"/> Ejectment <input type="checkbox"/> Eminent Domain <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Lien Assertion <input type="checkbox"/> Partition <input type="checkbox"/> Receiver Appointment <input type="checkbox"/> Tax Sale: Confirmation/Cancellation <input type="checkbox"/> Title, Boundary &/or Easement <input type="checkbox"/> Other <u> </u>	Civil Rights <input type="checkbox"/> Elections <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Post Conviction Relief <input type="checkbox"/> Prisoner <input type="checkbox"/> Other <u> </u>

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSISSIPPI
JUDICIAL DISTRICT, CITY OF _____

Docket No. _____
File Yr _____ Chronological No. _____ Clerk's Local ID _____

Docket No. If Filed
Prior to 1/1/94 _____

DEFENDANTS IN REFERENCED CAUSE - Page 1 of ____ Defendants Pages
IN ADDITION TO DEFENDANT SHOWN ON CIVIL CASE FILING FORM COVER SHEET

Defendant #2:

Individual: _____
Last Name First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

____ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

____ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business Wilmar Trucking Company
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

____ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) ____ Not an Attorney(✓) ____

Defendant #3:

Individual: Doe John #1
Last Name First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

____ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

____ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business _____
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

____ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) ____ Not an Attorney(✓) ____

Defendant #4:

Individual: Doe John #2
Last Name First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

____ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

____ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business _____
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

____ Check (✓) if Business Defendant is being sued in the name of an entity other than the above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) ____ Not an Attorney(✓) ____

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSISSIPPI
JUDICIAL DISTRICT, CITY OF

Docket No. _____
 File Yr _____ Chronological No. _____ Clerk's Local ID _____

Docket No. If Filed
 Prior to 1/1/94 _____

**DEFENDANTS IN REFERENCED CAUSE - Page ___ of ___ Defendants Pages
 IN ADDITION TO DEFENDANT SHOWN ON CIVIL CASE FILING FORM COVER SHEET**

Defendant # 5 :

Individual: Doe John #3
Last Name First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

___ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

___ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business _____
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

___ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) ___ Not an Attorney(✓)___

Defendant # 6 :

Individual: Doe John #4
Last Name First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

___ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

___ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business _____
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

___ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) ___ Not an Attorney(✓)___

Defendant # 7 :

Individual: Doe John #5
Last Name First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

___ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

___ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business _____
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

___ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) ___ Not an Attorney(✓)___

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSISSIPPI
JUDICIAL DISTRICT, CITY OF _____

Docket No. _____ Docket No. If Filed
File Yr _____ Chronological No. _____ Clerk's Local ID _____ Prior to 1/1/94 _____

DEFENDANTS IN REFERENCED CAUSE - Page ___ of ___ Defendants Pages
IN ADDITION TO DEFENDANT SHOWN ON CIVIL CASE FILING FORM COVER SHEET

Defendant # 8 :

Individual: _____
Last Name First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

___ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

___ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business John Doe Company #1
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

___ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) ___ Not an Attorney(✓)___

Defendant # 9 :

Individual: _____
Last Name First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

___ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

___ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business John Doe Company #2
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

___ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) ___ Not an Attorney(✓)___

Defendant # 10 :

Individual: _____
Last Name First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

___ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

___ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business John Doe Company #3
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

___ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) ___ Not an Attorney(✓)___

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSISSIPPI
JUDICIAL DISTRICT, CITY OF _____

Docket No. _____
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Docket No. If Filed
Prior to 1/1/94 _____

DEFENDANTS IN REFERENCED CAUSE - Page ____ of ____ Defendants Pages
IN ADDITION TO DEFENDANT SHOWN ON CIVIL CASE FILING FORM COVER SHEET

Defendant # 11 :

Individual: _____
Last Name First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

____ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

____ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business John Doe Company #4

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

____ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) _____ Not an Attorney(✓) _____

Defendant # 12 :

Individual: _____
Last Name First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

____ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

____ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business John Doe Company #5

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

____ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) _____ Not an Attorney(✓) _____

Defendant # ____ :

Individual: _____
Last Name First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

____ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

____ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business _____

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

____ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) _____ Not an Attorney(✓) _____

FILED

FEB 17 2022

RANDY CARNEY, CLERK

BY _____ D.C.

LAW OFFICES OF JAY FOSTER

1019 Legion Lane, Ocean Springs, MS 39564 Ocean Springs Tele: 228-872-6000

Email: Jay@JayFosterLaw.com

Website: www.JayFosterLaw.com

February 16, 2022

SENT via UPS Tracking

Jackson County Circuit Court
3104 Magnolia Street
Pascagoula, MS 39567

Re: Dangelo Townsel v. Ramon A. Williams and Wilmar Trucking Company

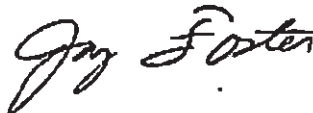
Dear Sir/Madam,

In regard to the above referenced matter, enclosed please find the following documents for filing:

1. Civil Cover Sheet.
2. Filing fee check.
3. Three Original Summons.
4. Original and (2) copies of a Complaint.
5. Self-addressed, Stamped envelope.

Please file in your usual manner. Also, please enclose all three original Summons back to me and the original Complaint and the 2 service copies of the Complaint to my office so that service of process may be effected. I have enclosed a self-addressed stamped envelope. Thank you for your prompt attention in this matter and if you should have any questions, please do not hesitate to contact our office.

Sincerely,



Jay Foster

enclosures: as stated

CIRCUIT - CIVIL **HANDED** ☐ **MAILED** ☒ **2-17-22**

Case: 30CV22-41678-11 Document # 1 Filed: 02/17/2022 Page 7 of 7

Received Of Jay Foster

Case No. 22-34

Mark's Fees	\$85.00	Total	<u>161.00</u>	Check	<u>7653</u>
BO Fund	\$40.00	Amount Paid \$		No.	
Steno Tax	\$10.00	For	<u>New Complaint</u>		
Jury Tax	\$3.00				
Law Library	\$2.50				
SCEF	\$2.00				
Court Adm. Fund	\$2.00				
CECSF	\$10.00				
CLAF	\$5.00				
SCCF	\$0.50				
RM FEE	\$1.00				
Copy of Summons Return		By	<u>RJ McNeary</u>		
Other Advance Cost					
TOTAL	\$ <u>161.00</u>				

RANDY CARNEY
CIRCUIT CLERK OF JACKSON COUNTY
DEPUTY CIRCUIT CLERK

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSISSIPPI

D'Angelo Townsel

FEB 17 2022

PLAINTIFF

v.

RANDY CARNEY, CLERK Cause No. 22-34(2)

BY _____ D.C.

Ramon A. Williams and Wilmar Trucking Company
And John Doe 1-5 and John Doe Company 1-5

DEFENDANTS

COMPLAINT

The plaintiff, D'Angelo Townsel, files this complaint against the defendant, Ramon A. Williams and Wilmar Trucking Company, and states as follows:

1. The plaintiff, D'Angelo Townsel lived in Lucedale, Mississippi at the time of this wreck.
2. The defendant, Ramon A. Williams and Wilmar Trucking Company, lived in 499 Robinson Circle, Jackson, AL 39545 and 900 Highway 28 West Camden, AL 36726, Mississippi at the time of this wreck.
3. The defendant's, John Doe 1-5 may be the correct name for Ramon A. Williams.
4. The defendant's John Doe Company 1-5 may be the correct name for Wilmar Trucking Company and/or for any other company that may be responsible for this wreck.
5. The Court has jurisdiction over the parties and the subject matter and venue is proper in this Court pursuant to Section 11-11-3 of the Mississippi Code.
6. On 2/23/2019, D'Angelo Townsel was driving his in Interstate 10 in Jackson County, Mississippi County and a wreck happened between D'Angelo Townsel's and the 18 wheeler driven by the defendant. The defendant, Ramon A. Williams and Wilmar Trucking Company, caused this wreck.
7. At the time of the wreck, Ramon Williams was employed by Wilmar Trucking Company.
8. Wilmar Trucking Company is vicariously liable for Ramon Williams.
9. Wilmar Trucking Company is liable for Ramon Williams under the doctrine of lease liability.
10. Wilmar Trucking Company is liable for Ramon Williams under the doctrine of agency.
11. Wilmar Trucking Company is liable for Ramon Williams under the doctrine of apparent agency.

12. Wilmar Trucking Company is liable for Ramon Williams under the doctrine of respondeat superior.
13. The defendant's negligence caused D'Angelo Townsel's injuries and damages.
14. The defendant's negligence contributed to D'Angelo Townsel's injuries and damages.
15. The Defendant rear-ended DeAngelo Townsel.
16. The Defendant was not paying attention when the Defendant rear-ended DeAngelo Townsel.
17. The Defendant's inattention caused this wreck.
18. The Defendant's inattention caused the wreck which in turned caused D'Angelo Townsel's injuries and damages.
19. D'Angelo Townsel did not cause this wreck.
20. D'Angelo Townsel was following all driving laws at the time of this wreck.
21. D'Angelo Townsel did not contribute to this wreck.
22. D'Angelo Townsel was not at fault for this wreck.
23. D'Angelo Townsel maintained proper control of D'Angelo Townsel's vehicle at all times.
24. D'Angelo Townsel was keeping a proper lookout at all times before this wreck.
25. On 2/23/2019, D'Angelo Townsel did not do anything wrong while driving.
26. Ramon A. Williams and Wilmar Trucking Company does not have any evidence that D'Angelo Townsel did anything wrong on 2/23/2019 while driving.
27. Ramon A. Williams and Wilmar Trucking Company does not have a witness who will testify that D'Angelo Townsel did anything wrong while driving on 2/23/2019.
28. Ramon A. Williams and Wilmar Trucking Company does not have any pictures showing that D'Angelo Townsel did anything wrong while driving on 2/23/2019.
29. Ramon A. Williams and Wilmar Trucking Company does not have any video showing D'Angelo Townsel did anything wrong while driving on 2/23/2019.
30. The wreck caused D'Angelo Townsel to get hurt.

31. The wreck caused D'Angelo Townsel to have pain.
32. The wreck caused D'Angelo Townsel to have pain and suffering.
33. The wreck caused D'Angelo Townsel to have emotional suffering.
34. The wreck caused D'Angelo Townsel to have back pain.
35. After the wreck, D'Angelo Townsel was unable to do the things he liked to do.
36. As a result of the wreck, D'Angelo Townsel was treated at Singing River Hospital.
37. At Singing River Hospital, D'Angelo Townsel told the doctor he was hurt in a wreck.
38. When D'Angelo Townsel told the doctor at about being hurt in a wreck, this was true.
39. At Singing River Hospital, the doctor diagnosed D'Angelo Townsel with back pain.
40. The diagnosis by the doctor at Singing River Hospital was correct.
41. Subsequently, D'Angelo Townsel went to Dr. Timothy Murphy for medical treatment.
42. D'Angelo Townsel told Timothy Murphy that Townsel was injured in a wreck.
43. When D'Angelo Townsel told Timothy Murphy that Townsel was hurt in a wreck this was true.
44. D'Angelo Townsel told Timothy Murphy that Townsel hurt his back.
45. When D'Angelo Townsel told Timothy Murphy that Townsel hurt his back, this was true.
46. Dr. Timothy Murphy's treatment for D'Angelo Townsel was reasonable and necessary.
47. The injury to D'Angelo Townsel's back was from this wreck.
48. D'Angelo Townsel went to Dr. Joseph Boucree for this wreck.
49. D'Angelo Townsel told Dr. Joseph Boucree he hurt his back in this wreck.
50. When D'Angelo Townsel told Dr. Joseph Boucree he hurt his back in this wreck, this was true.
51. Dr. Joseph Boucree injected D'Angelo Townsel for the back pain.
52. When Dr. Boucree injected D'Angelo Townsel for the back pain, D'Angelo Townsel

needed the injection.

53. Dr. Boucree diagnosed D'Angelo Townsel with a disc bulge.
54. Dr. Boucree's diagnosis is correct.
55. Dr. Boucree's treatment for D'Angelo Townsel was reasonable and necessary.
56. D'Angelo Townsel is not a malingerer.
57. Since the time of the wreck until now, D'Angelo Townsel has told the truth about the injuries from this wreck.
58. Since the time of the wreck until now, D'Angelo Townsel has told the truth about pain from this wreck.
59. Since the time of the wreck until now, D'Angelo Townsel has told the truth about how this wreck happened.
60. Since the time of the wreck until now, D'Angelo Townsel has not exaggerated injuries from this wreck.
61. Since the time of the wreck until now, D'Angelo Townsel has not shown any signs of somatoform disorder.
62. D'Angelo Townsel is not lying about injuries from this wreck.
63. D'Angelo Townsel is not lying about pain from this wreck.
64. D'Angelo Townsel's doctors are not lying about D'Angelo Townsel's pain from this wreck.
65. D'Angelo Townsel's doctors are not lying about D'Angelo Townsel's injuries from this wreck.
66. When the Defendant caused this wreck, the Defendant violated Section 63-3-201 of the Mississippi Code which makes it a misdemeanor to violate any traffic law.
67. When the Defendant caused this wreck, the Defendant violated Section 63-3-1201 of the Mississippi Code which prohibits wanton disregard for safety of people while driving or the driver is guilty of reckless driving.
68. When the Defendant caused this wreck, the Defendant violated Section 63-3-1213 of the Mississippi Code which prohibits careless driving.

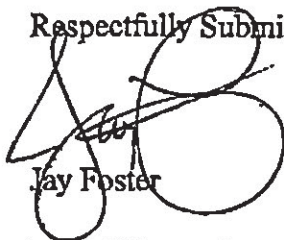
69. When the Defendant caused this wreck, the Defendant was negligent per se.
70. D'Angelo Townsel has not exaggerated the symptoms that D'Angelo Townsel has had from the time of the wreck until released from the doctor(s).
71. The Defendant violated Section 63-3-619 of the Mississippi Code which prohibits following too closely.
72. The Defendant violated Section 63-3-619 of the Mississippi Code by following too closely.
73. Following a car too closely is dangerous.
74. Following a car too closely is dangerous because this can cause wrecks.
75. If the Defendant was not following too closely at the time of this wreck, then a wreck would not have happened.
76. The Defendant broke the law by following too closely.
77. The Defendant chose to break the law by following too closely.
78. Even if there were no law against following too closely, the Defendant knew that following too closely can cause wreck and he chose to follow too closely anyway.
79. Following too closely is dangerous because this can cause wrecks and hurt people.
80. For years before this wreck, the defendant knew following too closely was dangerous.
81. For years before this wreck, the defendant knew following too closely was dangerous because following too closely can cause a wreck.
82. For years before this wreck, the defendant knew following too closely was dangerous because it can cause a wreck and hurt someone.
83. The defendant's decision to follow too closely caused this wreck.
84. The defendant's decision to follow too closely hurt D'Angelo Townsel.
85. The Defendant should be responsible for his actions.
86. The Defendant should be held accountable for his actions.
87. The Defendant should be held responsible for his actions by the jury.
88. The Defendant should be held accountable for his actions by the jury.

89. No one forced the Defendant to follow too closely.
90. Before making the decision to follow too closely, the Defendant had a choice, i.e., (a) he could follow too closely; or, (b) not follow too closely. The Defendant chose to follow too closely knowing this could cause a wreck.
91. The Defendant willfully chose to follow too closely even though he knew it could cause a wreck.
92. The Defendant made a conscious decision to follow too closely even though he knew it could cause a wreck.
93. The Defendant made a voluntary decision to follow too closely even though he knew it could cause a wreck.
94. D'Angelo Townsel is within the class of drivers that the laws about driving protect.
95. D'Angelo Townsel injuries and damages are the type that the driving laws are meant to prevent.
96. The Defendant was negligent per se by violating the driving laws.
97. The Defendant was grossly negligent in choosing to follow too closely because for years before this wreck, he knew following too closely could cause a wreck.
98. The Defendant's decision to follow too closely showed a reckless disregard for the safety of others.
99. The choice and decision the Defendant made to follow too closely means the Defendant is responsible for punitive damages.
100. There may be other facts and circumstances which make Wilmar Trucking Company liable for punitive damages.
101. The driver may have been driving when he should not have been driving per the Federal Motor Carrier Safety Regulations.
102. Wilmar Trucking Company may have known or should have known that Ramon Williams should not have been driving at the time of this wreck.
103. Wilmar Trucking Company failed to properly train Ramon Williams.
104. Wilmar Trucking Company failed to properly supervise Ramon Williams.

105. Wilmar Trucking Company failed to properly qualify Ramon Williams.
106. Wilmar Trucking Company should not have hired Ramon Williams.
107. Wilmar Trucking Company should have fired Ramon Williams before this wreck.
108. Wilmar Trucking Company failed to follow the Federal Motor Carrier Safety Regulations.
109. Wilmar Trucking Company is responsible for any damages D'Angelo Townsel had as a result of this wreck.
110. Ramon Williams failed to follow the Federal Motor Carrier Safety Regulations.
111. Wilmar Trucking Company is liable for negligent entrustment.
112. The defendants' actions and/or inactions was wilful and wanton and makes them liable for punitive damages.

As a result, D'Angelo Townsel has injuries and damages and requests damages for all injuries caused, including, but not limited to the following: pain, suffering, past, present, and future worry, emotional distress, physical impairment, injury to reputation, humiliation, embarrassment, loss of the enjoyment of life, other nonpecuniary damages, and any other theory of damages such as fear of loss, illness or injury; punitive damages, and past, present, and future mental anguish in an amount not to exceed the jurisdictional limits of this Court. Furthermore, D'Angelo Townsel requests all court costs, expert fees, witness fees, pre-judgment and post-judgment interest, and/or any other costs associated in any way with this case.

Respectfully Submitted,



Jay Foster
Law Offices of Jay Foster, No. 9830
1019 Legion Lane
Ocean Springs, MS 39564
(228) 872-6000
(228) 875-6687 (fax)
email: Jay@JayFosterLaw.com

Jury Trial Requested

Case: 30CI1:22-cv-00034-KJ Document #: 2 Filed: 02/17/2022 Page 16 of 20

Service will be issued by process server to:
Ramon A. Williams and Wilmar Trucking Company
499 Robinson Circle, Jackson, AL 39545 and 900 Highway 28 West Camden, AL 36726

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSISSIPPI

Dangelo Townsel .

PLAINTIFF

v.

Cause No. 22-34(z)

Ramon A. Williams and Wilmar Trucking Company
And John Doe 1-5 and John Doe Company 1-5

DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI

TO: Wilmar Trucking Company 900 Highway 28 West, Camden, AL 36726
OR WHERE EVER FOUND

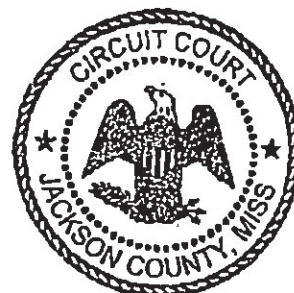
NOTICE TO DEFENDANT

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS
IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT
YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the Complaint to Jay Foster, the attorney for the plaintiffs, whose address is 1019 Legion Lane, Ocean Springs, Mississippi, 39564. Your response must be mailed or delivered within thirty days from the date of delivery of this Summons and Complaint or a judgment by default will be entered against you for the money or other things demanded in the complaint. You must file the original of your response with the Clerk of this Court within a reasonable time afterward. Notice is hereby given of service of the Plaintiff(s) request for production of documents, interrogatories, request for admissions and responses must be mailed or delivered within forty-five days from the date of delivery of this summons and discovery.

Issued under my hand and the seal of said Court, this 17 day of Feb,
2022.

Randy Curry
by: BQ McQuary, DC
CLERK



IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSISSIPPI

Dangelo Townsel

PLAINTIFF

v.

Cause No. 22-34621

Ramon A. Williams and Wilmar Trucking Company
And John Doe 1-5 and John Doe Company 1-5

DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI

TO: Ramon A. Williams 499 Robinson Circle, Jackson, AL 39545 OR
WHERE EVER FOUND

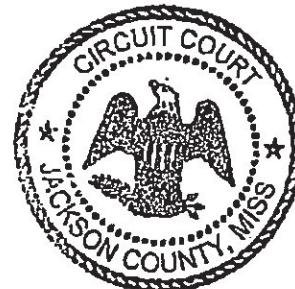
NOTICE TO DEFENDANT

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS
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YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the Complaint to Jay Foster, the attorney for the plaintiffs, whose address is 1019 Legion Lane, Ocean Springs, Mississippi, 39564. Your response must be mailed or delivered within thirty days from the date of delivery of this Summons and Complaint or a judgment by default will be entered against you for the money or other things demanded in the complaint. You must file the original of your response with the Clerk of this Court within a reasonable time afterward. Notice is hereby given of service of the Plaintiff(s) request for production of documents, interrogatories, request for admissions and responses must be mailed or delivered within forty-five days from the date of delivery of this summons and discovery.

Issued under my hand and the seal of said Court, this 17 day of Feb,
2022.

by: Randy Curney
Randy Curney, Jr.
CLERK



IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSISSIPPI
D'Angelo Townsel PLAINTIFF

v. Cause No. 30CI1:22-cv-00034-KJ

Ramon A. Williams and Wilmar Trucking Company DEFENDANT

SUBPOENA DUCES TECUM

The State of Mississippi
Jackson County

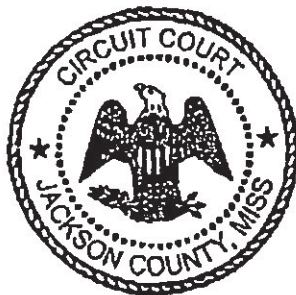
TO ANY LAWFUL OFFICER OR OTHER PERSONS AUTHORIZED TO SERVE
SUBPOENAS:

WE COMMAND YOU TO SUMMONS: Mississippi Highway Patrol

TO PRODUCE a **CERTIFIED** copy of the police report, audio recordings, body camera recordings, pictures, and/or video recordings for this wreck for D'Angelo Townsel. You must produce these documents to the law offices of Jay Foster, 1019 Legion Lane, Ocean Springs, MS 39564, within ten (10) days of receipt of this subpoena. Instead of appearing, you can just mail a **CERTIFIED** copy of the police report and just mail the other items requested. The date of the wreck is 2/23/2019 and the location is Interstate 10 in Jackson County, Mississippi. If you are unable to locate the report, please just call Jay Foster for more information.

Witness my signature and seal of this office, this the _____ day
of _____, 2022.

Prepared by:
Jay Foster, No. 9830
1019 Legion Lane
Ocean Springs, MS 39564
228-872-6000
228-875-6687 (fax)



Issued this the 4th Day of March, A.D., 2022
and Seal of Said Court Affixed

JACKSON COUNTY CIRCUIT CLERK
RANDY CARNEY, CLERK

BY: B. J. McCreary D.C.

FILED

MAR 02 2022

RANDY CARNEY, CLERK
BY _____ D.C.

LAW OFFICES OF JAY FOSTER

1019 Legion Lane, Ocean Springs, MS 39564 Ocean Springs Tele: 228-872-6000
Email: Jay@JayFosterLaw.com
Website: www.JayFosterLaw.com

February 16, 2022

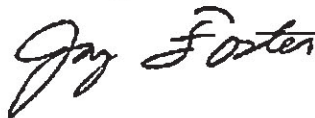
Jackson County Circuit Court
3104 Magnolia Street
Pascagoula, MS 39567

Re: Dangelo Townsel v. Ramon A. Williams and Wilmar Trucking Company
30CI1:22-cv-00034-KJ

Dear Sir/Madam,

I have enclosed a subpoena duces tecum. Please issue it when you get a chance. I have enclosed a self-addressed stamped envelope. Thank you for your prompt attention in this matter and if you should have any questions, please do not hesitate to contact our office.

Sincerely,



Jay Foster

enclosures: as stated